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**From:** Marlene Tyner-Valencourt [tyner-valencourt@wra-ca.com]  
**Sent:** 4/26/2022 12:12:47 AM  
**To:** Pankratz, Shannon L CIV USARMY CESPL (US) [Shannon.L.Pankratz@usace.army.mil]; Scianni, Melissa [Scianni.Melissa@epa.gov]; Lisa Gymer [Lisa.Gymer@wildlife.ca.gov]; Steinert, Tiffany@Waterboards [tiffany.steinert@waterboards.ca.gov]  
**CC:** Nate Bello [bello@wra-ca.com]; Julie Garren [julie.garren@wra-ca.com]; Tracey Brownfield [tracey@landveritas.com]  
**Subject:** Petersen Ranch MB - Per-Area Proposals for Performance Evaluation Modifications  
**Attachments:** 2022-04-25\_prmb\_per area proposals to modify performance standard assessment and evaluation\_final.pdf

Hello Petersen Ranch IRT,

Several weeks ago, we came together to discuss ideas for how evaluation of performance at the Petersen Ranch Mitigation Bank could be modified given several constraints that have arisen over the past few years of monitoring. These constraints include, among others, prescribed CRAM modules, unattainable CRAM target scores, and limited flexibility on the IRT's part to consider context when assessing performance attainment. The IRT determined that they would like to meet separately to discuss which proposals would best fit the specific areas of the Bank and would provide guidance to the Bank Sponsor on the appropriate next steps.

To help facilitate this internal discussion and per request by USACE, WRA has prepared the attached memo, which provides our recommendations and preferences for which proposals best apply to which areas. The majority of these proposals have already been submitted to the IRT in a memo dated February 8, 2022, with only a few new proposals added for IRT consideration.

Please note these are first-passes that largely target issues with CRAM, and we recognize that additional focus may be warranted on how to modify evaluation of UPS attainment. We look forward to working collaboratively with the IRT on ways to update and improve performance evaluation at Petersen Ranch in order for the Bank Sponsor to better demonstrate success over a reasonable time frame.

Please take a look over the next few days as your schedule allows as I would love to get some initial feedback from the IRT during our meeting this upcoming Thursday 4/28. We can also discuss the on-site visit we completed last week with USACE and CDFW in the context of these proposals at that time.

Thanks and please reach out should you have any questions.

Best,  
Marlene

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